

Caringa Australia will always act in the best interests of our Clients and ensure that a participant's right to choice and control is maximised at all times.

Caringa Australia's clients will remain informed of their rights and empowered to make their own decisions regarding their life and care.

Caringa Australia is committed to support clients to implement all the supports outlined in their Plan. This includes informal, mainstream and community supports, as well as funded supports.

Caringa Australia acknowledges and actively works to reduce the risk of conflict of interest issues arising from the provision of Support Coordination and/or Plan Management alongside other services.

Ultimately Caringa Australia's Support Coordination activities are intended to encourage and support participants to increase their participation in the community and coordinate their own supports.

Record of Policy Development

Version	Date Approved	Date for Review
1	04/11/2021	04/11/2022

Responsibilities and Delegations

This policy applies to	Caringa Employees working within Support Coordination & Plan Management Teams
Specific Responsibilities	N/A
Policy Approval	Governance and Risk Committee

Policy Context- This policy relates to:

Standards	NDIS Practice Standards
Legislation	National Disability Insurance Scheme (NDIS Practice Standards) Rules 2018 National Disability Insurance Scheme (Code of Conduct) Rules 2018 National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018 National Disability Insurance Scheme (Quality and Safeguards Commission) Rules 2018 National Disability Insurance Scheme (Protection and Disclosure of Information—Commissioner) Rules 2018
Contractual Obligations	N/A
Organisation Policies	Professional Ethics and Conduct Conflict of Interest

	Confidentiality Privacy
Forms, record keeping, other documents	Plan Management Project Notes (MYP) Support Coordination Project Notes (MYP) Service Agreement Schedule of Support

Definitions

Participant Plan (Plan): is a document approved by the National Disability Insurance Agency which sets out a participant’s context, goals and aspirations, and the way supports will help them to achieve these goals.

Support Coordination: is the funded support a participant receives to connect them with the services they require to achieve the goals outlined in their Plan. Support Coordination can include initial assistance in connecting participants with the right supports to meet their needs, sourcing providers, as well as general assistance navigating the support provider market.

Plan Management: is the assistance and support provided to a participant to manage the funded supports in their Plan.

Assist Life Stages and Transitions: is a part of the Support Coordination process and refers specifically to the assistance a participant receives to plan for and adapt to different phases of their life. It can include mentorship, skills development and job training.

Conflict of Interest: is a situation where a person or organisation can derive a real or perceived benefit from actions or decisions made because of their position/official capacity.

Captive Participant: is a participant who receives all of their services, including Support Coordination services, from a single organisation.

Policy:

Caringa Australia is registered to provide Support Coordination Services:

1. Support Connection

Caringa will provide some assistance in starting a participant’s Plan, connect participants with other providers and monitor Plan progress. We also provide Assist Life Stages and Transitions services to prepare participants for the challenges they may face when undergoing life stage transitions, and help them to overcome any barriers.

2. Support Coordination

Caringa will provide assistance in starting a participant’s Plan, monitoring the Plan, and addressing any issues or barriers that may arise regarding the delivery of supports in accordance with the Plan.

3. Specialist Support Coordination

We provide the same supports as level 2, but with the requirement for a specialised framework necessitated by specific high-level risks/needs.

Caringa Australia Limited and all employees will ensure that when providing supports to customers under the NDIS, including when offering plan management or support coordination services, any conflict of interest is declared and any risks to customers are mitigated.

All employees will act in the best interests of NDIS participants and other customers, ensuring that participants are informed, empowered and able to maximise choice and control. Staff members will not (by act or omission) constrain, influence or direct decision-making by a person with a disability and/or their family so as to limit that person's access to information, opportunities, and choice and control.

Employees will ensure that Caringa Australia Limited proactively manages perceived and actual conflicts of interest in service delivery. Employees will:

- Manage, document and report on individual conflicts as they arise, and
- Ensure that advice to a participant about support options (including those not delivered directly by Caringa Australia Limited) is transparent and promotes choice and control.

As required by the NDIA Terms of Business, all participants will be “treated equally, and no participant [shall be] given preferential treatment above another in the receipt or provision of supports”.

Implementing all supports in the participant Plan

Caringa Australia will support all participants who engage Caringa Australia for Support Coordination and/or Plan Management services to connect with providers in order to implement all supports outlined in their Plan, and ensure that they receive fair prices for the supports provided.

Managing Conflicts of Interest in Plan Management and Support Coordination

Where relevant, Caringa Australia's Support Coordinators and Plan Managers will inform participants that:

- Caringa Australia offers Plan Management and Support Coordination, as well as a range of other supports under the NDIS;
- The participant has, at all times, the option to choose either Caringa Australia or another service provider for their Plan Management, Support Coordination and/or other supports;
- There are many other registered Plan managers under the NDIS, and they are listed on the NDIS website;
- Even if an individual chooses to use Caringa Australia as their Plan Manager or Supports Coordinator, they do not have to use any supports provided by Caringa Australia; and
- Caringa Australia will offer supports to participants regardless of whether they self-manage their Plan, use the NDIA, or any other registered Plan manager.
- Caringa's Support Coordinators receive no referral fees for any referral made to any provider.

Caringa Australia Support Coordinators will obtain confirmation that the above information has been disclosed to the participant in order to maximise individual choice and control.

- If a participant indicates that they do not wish to be referred to other services, Caringa Australia's Support Coordinators will demonstrate and document that other options for supports have been explored, the participant's choice is free from influence, and the

participant had full choice and control in the decision-making process. Notes will be made in Caringa's CRM Database (MYP) confirming the advice given to the customer.

This policy will be implemented in conjunction with Caringa's Conflict of Interest Policy.

Managing the risk of Captive Participants

To reduce the risk of harm, exploitation abuse or neglect, we will ensure that participants who receive all of their services from Caringa Australia regularly receive information regarding the other service organisations available to them.

The Chief Operating Officer is responsible for auditing participant Plans to ensure that the risks arising from Captive Participants are managed effectively and clients are informed of their options.

Separation of service delivery, Support Coordination, and Plan Management teams

In order to avoid risk of (or actual) conflict of interest, Caringa will maintain a separation between the service delivery team/s, the Support Coordination team/s and the Plan Management team/s.

Where it is not possible to physically separate teams between offices, Caringa Australia will ensure workers are aware of the separation of their roles.

Records relating to the supports a participant has sought or received will not be shared between the service provision team/s, the Support Coordination team/s and Plan Management team/s.

Gifts, benefits and commissions and the NDIS

Caringa Australia Limited or its staff must not accept any offer of money, gifts, services or benefits that would cause them to act in a manner contrary to the interests of an NDIS participant. Further, employees must have no financial or other personal interest that could directly or indirectly influence or compromise the choice of provider or provision of supports to a participant. This includes the obtaining or offering of any form of commission by employees or Caringa Australia Limited.

Documenting and recording

Caringa will accurately document Support Coordination and Plan Management activities, including where participants have been given information and access to external service providers.

The People and Culture Officer is responsible for maintaining an up-to-date conflict of interest register

End of Document
